

Exhibit B

Tram Nguyen

From: Michelle Parfitt
Sent: Tuesday, September 08, 2020 1:00 PM
To: Tram Nguyen
Cc: Michelle Parfitt
Subject: Fwd: MDL 2738 – Notice of Document Deficiencies

Michelle A. Parfitt
Senior Partner

Ashcraft & Gerel, LLP
1825 K Street NW, Suite 700
Washington, DC 20006
Office: 202.783.6400
Mobile: 202.669.0032
Fax: 202.416.6392
mparfitt@ashcraftlaw.com



Begin forwarded message:

From: "Sharko, Susan M" <susan.sharko@faegredrinker.com>
Subject: RE: MDL 2738 – Notice of Document Deficiencies
Date: September 3, 2020 at 4:27:18 PM EDT
To: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>, Michelle Parfitt
<MParfitt@ashcraftlaw.com>

Leigh and Michelle, as you will recall, we agreed to this language of yours based on your representation that plaintiffs would act diligently to get records. We assumed, apparently erroneously, that a law firm would have had some medical records before filing suit. At the very least, they can call doctors directly and arrange to have records picked up or sent. There are about 100 plaintiffs who didn't produce any medical records at all. The vast majority are Onder plaintiffs. Seems incredible that with this amount of lead time and the duty of plaintiffs' counsel to have exercised due diligence in filing their cases that they still would have no medical records at this point. Not having a single record puts us at a distinct disadvantage in making our selections. We have only what plaintiffs decide to tell us to go off of. Frankly, I'm not sure what there is to discuss here. The plaintiffs have had 90 days to get medical records. Most produced something. This 10% or so nothing.

From: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>
Sent: Thursday, September 3, 2020 12:56 PM
To: Sharko, Susan M <susan.sharko@faegredrinker.com>

Cc: Brennan, Jessica L. <jessica.brennan@faegredrinker.com>; Michelle A. Parfitt
(mparfitt@ashcraftlaw.com) <mparfitt@ashcraftlaw.com>; pec@talc-mdl.com; Sindhu Daniel
<sdaniel@baronbudd.com>

Subject: FW: MDL 2738 – Notice of Document Deficiencies

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Susan, the notice below is incorrect and misstates the Court's orders regarding core medical records. The Court's order of May 15, 2000, attached, requires that within 90 days of the Order identifying Selected Cases, "counsel for Plaintiffs shall promptly order the following core records and produce them to defense counsel upon receipt". The Court's May 26 and June 4 orders (attached) all have consistent language. The orders do not require production of records 90 days from the date of selection or September 2, but rather that the records are ordered promptly and provided to Defendants upon receipt. We request that you revise these notices to more accurately reflect the applicable orders. What is your availability to discuss these issues by telephone?

Best regards,
Leigh

P. Leigh O'Dell

Principal
334.269.2343

From: Talc <Talc@browngreer.com>

Sent: Thursday, September 3, 2020 11:19 AM

To: tcanino@morrisbart.com; rroot@morrisbart.com; rphilips@morrisbart.com; rcoppers@morrisbart.com; rwarren@morrisbart.com; tlewis@morrisbart.com; dgreen@morrisbart.com; dtran@morrisbart.com

Cc: KFRAZIER@shb.com; jessica.brennan@faegredrinker.com; Leigh O'Dell

<Leigh.ODell@BeasleyAllen.com>; mparfitt@ashcraftlaw.com; Talc <Talc@browngreer.com>

Subject: MDL 2738 – Notice of Document Deficiencies

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Morris Bart, LLC
VIA EMAIL

Re: Notice of Failure to Submit Supporting Documents
In re Johnson & Johnson Talcum Powder Marketing, Sales Practices and Products
Liability Litigation – MDL No. 2738

Dear Counsel,

This is to notify you of the failure by the plaintiff(s) referenced below to submit the required supporting documents by the deadline prescribed in the Court's June 4, 2020, Order ("Order").

Pursuant to the Order, plaintiffs in the 1000 Selected Cases were required to serve upon Defendants via MDL Centrality:

- a complete and verified PPF;
- certain core records, including: “[a]ll medical records or reports from any hospital, physician, or other health care provider who treated plaintiff for ovarian cancer or any gynecologic disease, condition or symptom alleged in the Complaint and/or PPF, and [i]f applicable, decedent-user’s death certificate and copies of letters testamentary or letters of administration confirming standing of the named plaintiff or proof that plaintiff is working to obtain letters testamentary or letters of administration”; and
- an executed Limited Authorization to Disclose Health Information

These documents were to be provided within 90 days of the Order, which fell on Wednesday, September 2, 2020.

Plaintiffs have three days from the date of this correspondence in which to comply fully with the requirement to submit supporting documents. After three days, Defendants will move to dismiss with prejudice the cases of plaintiffs who have failed to comply with the CMO.

Plaintiff Name	Plaintiff ID	Law Firm Name	Medical Records	Verifi
BIER, BETTY	2078	Morris Bart, LLC		
WALKER, SARAH	2091	Morris Bart, LLC	Not Produced	Not Pro
HARRIS, JEANNE	2092	Morris Bart, LLC		Not Pro
FLETCHER, CAROLYN	2094	Morris Bart, LLC	Not Produced	
LOUPE, ELSIE	2102	Morris Bart, LLC	Not Produced	
SULLIVAN, MARGARET	2104	Morris Bart, LLC	Not Produced	

Jessica L. Brennan
Faegre Drinker Biddle & Reath LLP
600 Campus Dr.
Florham Park, NJ 07932-1047
jessica.brennan@faegredrinker.com
1-973-549-7164

MDL Centrality Administrator
BROWNGREER PLC
250 Rocketts Way
Richmond, Virginia 23231
Telephone: (804) 521-7200
Facsimile: (804) 521-7299
www.browngreer.com

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